



Date: March 7<sup>th</sup>, 2014

Co-Mo Electric Cooperative, Inc. and Co-Mo Comm, Inc.  
PO Box 220  
Tipton, MO 65081

Ms. Marlene Dortch, Secretary  
Federal Communications Commission, via electronic filing  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: WC Docket 10-90 - Connect America Fund – Expression of Interest for Rural Broadband Experiment

## Introduction

Co-Mo Electric Cooperative was founded in 1939 to provide service to members who were unserved. Seventy-two years to the actual day the first cooperative member was connected, Co-Mo Comm, the cooperative's subsidiary, lit its first fiber optic served broadband customer as part of the new Co-Mo Connect network. The Cooperative — along with Co-Mo Comm, Inc. — is actively deploying fiber-to-the-home technology across the cooperative's 2,300 square miles in Central Missouri. Our cooperative believes next-generation broadband is critical to the viability of our region. This belief is backed by our actions starting in 2011 to begin the process of constructing a state-of-the-art fiber-to-the-home communication network capable of delivering gigabit speeds to the cooperative members and provide electric-grid communication for improved electric service. Our project was born from a grassroots effort to build a pilot FTTH project on more than 100 miles of electric distribution plant passing more than 1,150 homes and businesses. That project concluded successfully in 2012 and became the foundation for our four-phase plan to deploy fiber on 4,000 miles of electric plant passing 32,000 services. Phase 1 is nearing completion, and Phase 2 just recently was approved by our board of directors. Each phase of the project has decreasing density and will become increasingly difficult to deploy. Phases 3 and 4 have not yet received approval for construction or funding by our Board of Directors.

A majority of the cooperative's service territory is unserved, underserved or poorly served with low-speed, unreliable DSL on aging copper plant. Phases 2, 3 and 4 of our project contain no areas served by a cable provider. Some census blocks in our region might indicate being served by 3 mbps DSL, but that service fails to deliver on the promise of true broadband. Our members who do have DSL report to us that these advertised speeds are unattainable and are frequently interrupted by the unreliability of the old copper plant. These levels of service would be unacceptable in any city of any size. It will be only a matter of time before these legacy services will no longer be considered broadband and when that day comes our rural areas will be behind once again. We can do better by deploying a scalable, robust, next generation FTTH network. This Co-Mo Connect network is already proving beneficial to our community by helping us retain businesses and improve connectivity to schools at lower costs. Schools are being upgraded from 1.5 mbps and 3 mbps speeds to 100 mbps for a lower monthly fee. Gigabit speeds are available for any school, library or community anchor institution that falls within our service area at rates less expensive than a T1 1.5 mbps service.

Through extensive research and testing of multiple creative methods of construction and implementation, we believe we have lowered costs of deployment of an all-fiber-optic network in rural areas. While focusing on lower cost, we have built in reliability and redundancies to ensure quality service to our subscribers. Our belief that rural electric cooperatives hold the key to solving the rural broadband availability problem is so strong we have been willing to be open and share information with cooperatives from around the nation that are also interested in deploying fiber to serve their members. Many Electric Cooperatives in the Missouri cooperative system are working together to share resources, technology, and video equipment to deploy our networks more efficiently. United Electric Cooperative and Co-Mo are partnering today and we fully expect this partnership to expand to others in the near future.

### **Our services**

Co-Mo Comm delivers broadband, telephone and a recently launched television service under the name Co-Mo Connect. Co-Mo Comm has partnered with Big River Telephone to provide telephone service. We have recently announced new service tiers and pricing effective in April 2014. Residential rates range from \$39.95 per month for 5 mbps down/3 mbps up, to 100 mbps for \$59.95, and to gigabit service for \$99.95. Small-business and education services have symmetrical download and upload speeds with rates that vary from \$59.95 for 10 mbps to \$129.95 for 100 mbps, to \$499.95 for gigabit service. A bundle discount of \$15 per month is given for those who take two services and \$35 per month for those who choose all three. We provide a value triple-play bundle of broadband internet, more than 60 high definition TV channels, and feature-rich telephone with unlimited long distance for a combined \$99.85 per month.

### **Project details**

Our project would include all or part of the following census tracts:

<b>State</b>	<b>County</b>	<b>Eligible Tract</b>	<b>Number of blocks in Co-Mo Service Territory</b>
29	015	460100	131
29	015	460300	143
29	015	460400	464
29	051	020600	57
29	053	950100	546
29	053	950200	46
29	053	950300	103
29	053	950400	37
29	053	950500	825
29	135	385100	462
29	135	385200	66
29	135	385300	424
29	135	385400	137
29	141	470100	617
29	141	470200	270



29	141	470300	56
29	141	470400	229
29	141	470500	669

Co-Mo's planned investment to complete the entire four phases and three additional municipal projects is \$70,000,000. We are requesting a one-time capital assistance payment of \$21,466,677, leaving Co-Mo's investment to be \$48,533,323.

Area	Estimated cost per passing	Passings	Total one time assistance requested
Phase 1	Complete	16,597	\$0.00
Phase 2	\$2,530	7,026	\$7,236,780
Phase 3	\$3,207	4,503	\$7,686,621
Phase 4	\$3,361	3,516	\$6,543,276
Municipal projects	\$1,000	5,000	\$0.00
<b>Total</b>		<b>36,642</b>	<b>\$21,466,677</b>

Our entire project will allow hundreds of community anchor institutions to connect to up to gigabit speeds. Forty-three public and private schools, 15 health care organizations, four libraries and more than 200 government and public safety facilities would have access.

### Summary

We strongly feel that Co-Mo and other rural electric cooperatives can do better than what is being done now by other providers. We can deliver a brand new next-generation network, a new network built upon future-proof fiber optics that will be self-sustainable for 20 to 30 years and beyond without additional subsidy. We are not bound by legacy network technology and are motivated purely by providing a service to our communities. Our mission to help our community extends beyond our membership; we have recently begun fiber optic construction on the first of three non-member areas with a project in the municipal boundaries of California, Missouri. We are determined to not leave anyone behind. Rural broadband experiments fund availability would allow us to obtain board approval to accelerate our project and to complete Phases 2, 3, and 4 ahead of schedule to ensure 100 percent availability of gigabit service to our region in Missouri.

Co-Mo is well-positioned to complete a successful rural broadband experiment. Construction crews are working on-site, billing systems are in place, design and staking crews are in the field, and we have access to financing.

Respectfully submitted,



Ken Johnson, CEO/GM  
Co-Mo Electric Cooperative, Inc.



Randy Klindt, General Manager  
Co-Mo Comm, Inc.